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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

JOANNE FARRELL, on behalf of
herself and all others similarly situated,

Plaintiff,

v.

BANK OF AMERICA, N.A.,

Defendant.

Case No. 3:16-cv-00492-L-WVG

**DECLARATION OF PAVEL
HARUTYUNYAN IN SUPPORT
OF BANK OF AMERICA, N.A.'S
MOTION TO DISMISS**

Judge: Hon. M. James Lorenz

I, Pavel Harutyunyan, declare as follows:

1. I am employed as an Officer; Litigation Specialist II (Litigation Specialist II) for Bank of America, N.A. ("BANA"). I have held this position since October 1, 2012. I am authorized to make this declaration on behalf of BANA in support of its Motion to Dismiss in the above-captioned action. If called, I could and would testify competently to the facts set forth in this Declaration.

2. In my capacity as Litigation Specialist II, I have personal knowledge of BANA's procedures for creating and maintaining certain business records. This includes records made and kept in the course of BANA's regularly conducted business activities.

3. Attached hereto as Exhibit A is a true and correct copy of the Deposit

1 Agreement and Disclosures in effect for personal checking accounts and money
2 market accounts from February 6, 2015 through March 3, 2016.

3 4. Attached hereto as Exhibit B is a true and correct copy of the Personal
4 Schedule of Fees in effect for personal checking and money market accounts from
5 August 7, 2015 through November 5, 2015.

6 5. Attached hereto as Exhibit C is a true and correct copy of the Personal
7 Deposit Account Addendum in effect for money market accounts from August 7,
8 2015 through the present.

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10 I declare under penalty of perjury that the foregoing is true and correct.

11 Executed on 28 day of April, 2016.

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14 Pavel Harutyunyan
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